ATL ENGINEERING, P.C.

July 24, 2013

New York State Department of Environmental Conservation
Region 7, Division of Environmental Remediation
615 Erie Boulevard West
Syracuse, New York 13204

Attn: Mr. Harry Warner, PE

Re: Remedial Action Work Plan
PCB-Contaminated Topsoil
H.W. Smith School
1130 Salt Springs Road
Syracuse, Onondaga County, New York
NYSDEC Spill No. 13-03517
ATL Engineering Report No. AE094CE-06-07-13

Ladies/Gentlemen:

Enclosed is an electronic copy of the Remedial Action Work Plan prepared by ATL Engineering, P.C. (ATL Engineering) for the referenced site. This report is being submitted by ATL Engineering, on behalf of RH Law, Inc.

Please contact our office should you have any questions, or if we may be of further assistance.

Sincerely,
ATL Engineering, P.C.

Cheyenne J. Dashnaw, PE
Senior Project Manager

CJD/MBR/asv

Enclosures

REMEDIAL ACTION WORK PLAN

PCB-CONTAMINATED TOPSOIL
H.W. SMITH SCHOOL
1130 SALT SPRINGS ROAD
SYRACUSE, ONONDAGA COUNTY, NEW YORK
NYSDEC SPILL NO. 13-03517

PREPARED FOR:

New York State Department of Environmental Conservation
Region 7, Division of Environmental Remediation
615 Erie Boulevard West
Syracuse, New York 13057

PREPARED BY:

ATL Engineering, P.C.
6431 US Highway 11
Canton, New York 13617

ATL ENGINEERING REPORT NO. AE094CE-06-07-13

JULY 24, 2013

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APPENDICES

1.0 INTRODUCTION

1.1 Purpose

ATL Engineering, P.C. (ATL Engineering) was retained by RH Law, Inc. (RH Law), to prepare a Remedial Action Work Plan (RAWP) for polychlorinated biphenyl (PCB)-contaminated topsoil that has been identified at the H.W. Smith School site. The purpose of this RAWP is to summarize proposed remediation methods, selected in consideration of the project conditions and correspondence with the New York State Department of Environmental Conservation (NYSDEC). The PCB-impacted soil associated with the H.W. Smith School site has been assigned NYSDEC Spill No. 13-03517.

This RAWP contains the scope of work and site-specific considerations associated with the remediation efforts that are proposed to effectively remove the PCB soil contamination at the subject site. The RAWP is based on information obtained from the following sources.

- Correspondence with representatives of the NYSDEC and RH Law
- Soil Investigation Report, prepared by ATL Engineering and dated July 22, 2013
- Summary of Analytical Results report, prepared by Certified Environmental Services, Inc. (CES), and dated June 20, 2013

1.2 Site Description

The H.W. Smith School is located at 1130 Salt Springs Road, Syracuse, Onondaga County, New York. The subject site is currently developed with a school building, associated asphalt-covered driveways and parking areas, and other appurtenant facilities. The subject site is located in an urban area, with surrounding properties primarily developed with educational/institutional and residential buildings and facilities. A Site Location Map, depicting the approximate location of the subject site, is included as Appendix A. A description of affected areas on the subject site is provided in Section 2.1.

1.3. Background Information

NYSDEC Spill No. 12-07324 was assigned to the RH Law property, located at 6883 Schuyler Road, East Syracuse, New York, subsequent to the identification of elevated PCB concentrations in topsoil material staged at that site. Soil sampling investigations performed by CES indicate the likely source of the PCB contamination is a site identified as Woodbine Office Park, located at the southeast intersection of Canada Drive and Loucks Road, East Syracuse, Onondaga County, New York. Prior to having knowledge of PCB within the referenced topsoil material, this material was placed by RH Law at five project sites, including the H.W. Smith School site. Based on the separate locations and different owners of the affected sites, and as a means to manage each site individually with respect to investigation and remediation activities, the NYSDEC was contacted to assign a distinct spill number to each of the affected sites. The H.W. Smith School site was assigned NYSDEC Spill No. 13-03517.

2.0 SITE CHARACTERIZATION AND DELINEATION

2.1 Areas of Concern and Affected Resources

The affected areas of the subject site, where topsoil was placed by RH Law during scheduled site improvements, are located on the west side of the on-site H.W. Smith School building. There is also a small stockpile of the topsoil (estimated at 6 cubic yards) located to the southeast of the subject building. The PCB Delineation Plan, contained in Appendix B, provides a site layout detailing the locations of the affected areas on the west side of the building. The approximate location of the small stockpile, identified as the "SE Pile" is shown on the Site Location Map in Appendix A.

The area on the west side of the school building is a parking lot, bordered by new curb and the PCB-impacted topsoil. Information provided by RH Law indicates the topsoil material was generally placed at depths of 0 (ground surface) to 18 inches below surface.

As indicated on the PCB Delineation Plan in Appendix B and further discussed in Section 2.3, soil investigations conducted to-date have been performed by segmenting the affected areas into zones. The area on the west side of the school building was segmented into 18 zones, identified as 1 through 18. A sample of the SE Pile has also been collected.

Available site data and records of site management indicate that affected environmental resources are limited to surface soil. Based on the shallow depth at which the topsoil material was placed, groundwater impacts are not considered to be a concern. The placement of sod over the affected topsoil material would limit impacts to surface water from precipitation. Due to the limited mobility of PCB in soil, it is anticipated that impacts from infiltration through the topsoil material would also be limited.

2.2 Site Exposure Considerations

Worker exposure considerations for remediation work include the potential for inhalation, and dermal contact with soil, debris, or waste decontamination liquids containing PCB contamination. Additional details pertaining to worker exposure considerations, safety procedures, and appropriate personal protective equipment (PPE) will be outlined in a site-specific health and safety plan to be prepared by Soaring Eagle Safety Consultants, Inc., on behalf of RH Law.

The potential for public exposure during site remediation activities would be limited through the establishment of a restricted access work area. Furthermore, the remediation work is scheduled to be performed during the summer months while school operations are minimal. Additional details pertaining to work area setup and public exposure considerations will be outlined in the referenced site-specific health and safety plan.

2.3 Summary of Previous Investigation Results

Soil sampling and analysis, conducted by CES in May 2013, identified PCB within the topsoil material. The sampling was performed in accordance with a sampling plan submitted to the NYSDEC by CES and dated April 19, 2013. Composite soil samples were collected from segmented zones on May 9, 2013. The collected samples were laboratory analyzed by CES, a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) approved laboratory (ELAP No.

11246). One of the collected samples was split and submitted to Life Science Laboratories, Inc. (LSL) for analysis. LSL is a NYSDOH ELAP approved laboratory under ELAP No. 10248. CES performed PCB analysis in accordance with EPA Method 8082, using Soxhlet extraction (EPA Method 3540C). LSL performed PCB analysis in accordance with EPA Method 8082, using ultrasonic extraction (EPA Method 3550B). A summary of the laboratory analysis results for soil samples collected by CES is included in the Soil Investigation Report prepared by ATL Engineering and dated July 22, 2013. A copy of this report is contained in Appendix C. The PCB Delineation Plan, contained in Appendix B, depicts the analytical results for each sampled zone.

As indicated in the Soil Investigation Report prepared by ATL Engineering and dated July 22, 2013, laboratory analysis results for composite soil samples collected by CES on May 9, 2013, identified detectable concentrations of PCB, specifically Aroclor 1248. The detected PCB concentrations for soil samples collected by CES were below the hazardous material limit of 50 ppm, and not within a range considered to be close to the hazardous material limit (i.e., material within the range of 40 to 49 ppm). The PCB Delineation Plan, contained in Appendix B, shows the areas with soil determined to contain detectable concentrations of PCB at levels less than 50 ppm.

3.0 PROPOSED REMEDIAL ACTION

The following sections summarize proposed remedial action that will be implemented at the subject site. In general, proposed remedial activities include removal of impacted soil, disposal of soil at an approved landfill facility, and subsequent post-excavation confirmation sampling and analysis. A Project Remediation Flow Chart, contained in Appendix D, depicts a general outline of the proposed remedial action steps.

3.1 Site Cleanup Goals

Consideration has been given to the desired cleanup goals to be met at the subject site, through correspondence between representatives of ATL Engineering, RH Law, and the NYSDEC. The primary factors that were evaluated for selecting appropriate site cleanup goals are listed below.

- Current property usage and anticipated future property usage as a school facility
- Potential for future exposure
- Available site data and records for placement of the PCB-impacted soil
- Expected interest of property owner to attain pre-existing conditions
- Established NYSDEC unrestricted use Soil Cleanup Objectives (SCO)

It is the intent of RH Law, in the interest of the property owner and as necessary to effectively address the identified PCB contamination, to remove the PCB-impacted topsoil throughout the depth of placement. Furthermore, the remaining underlying soil material will be evaluated subsequent to excavation activities to assess potential residual PCB concentrations. Collected post-excavation soil samples shall be compliant with the NYSDEC unrestricted use SCO for PCB in surface soil, established at 1 ppm. The remediated area will be covered with replacement topsoil and landscaped pursuant to agreements between RH Law and the property owner.

3.2 NYSDEC Notification

Since the affected topsoil material was determined to contain PCB at concentrations less than 50 ppm, investigation and remediation activities for the subject site are being coordinated and managed through the NYSDEC, Region 7, under NYSDEC Spill No. 13-03517. As requested, the NYSDEC will be notified in advance of any site investigation or remediation work to be performed.

3.3 Site Preparation and Management

3.3.1 Site Health and Safety Plan

A site-specific health and safety plan is being prepared by Soaring Eagle Safety Consultants, Inc., on behalf of RH Law.

3.3.2 Worker Training and Personal Protective Equipment

RH Law has contracted with Soaring Eagle Safety Consultants, Inc., to receive appropriate training for workers that engaged in the site remediation activities. Other site personnel, including representatives of ATL Engineering conducting remediation monitoring and soil sampling and analysis activities, will also have appropriate training prior to the remediation project. All personnel on-site during remediation work will be required to review the site-specific health and safety plan and attend daily safety meetings. Required PPE will be as specified in the site-specific health and safety plan.

3.3.3 Work Area Setup and Decontamination Procedures

Protocol for work area setup and decontamination procedures are included in the site-specific health and safety plan to be prepared by Soaring Eagle Safety Consultants, Inc.

3.4 Excavation Monitoring

A representative of ATL Engineering will be on-site during remediation activities to monitor excavation activities, examine exposed soil, and collect post-excavation soil samples. The on-site environmental consultant will also be available to provide guidance relative to the RAWP described herein.

Daily remediation monitoring logs will be maintained at the project site. To the extent possible, based on project conditions and capacity of on-site representatives, the following items will be recorded on daily field logs and/or other applicable forms.

- Contractor(s) and subcontractor(s) hours on-site
- Log of on-site personnel and companies, including workers and visitors
- Description of major equipment used on-site to facilitate remediation activities
- Weather conditions
- General observations relating to work progress
- Photographs along with description of subject, location, and direction (if applicable)
- Record of collected samples
- Record of project-related correspondence

3.5 PCB-Contaminated Soil Excavation

Excavation activities will be performed by RH Law. PCB-contaminated soil will be removed from zones, designated during the site investigation and characterization phase, and either live loaded for direct transport to the appropriate landfill facility, or temporarily placed in stockpiles at predetermined, designated locations. The zones have been identified as material containing less than 50 ppm PCB. Reference the PCB Delineation Plan, contained in Appendix B, for a layout of the zones and associated previously determined PCB concentrations for collected soil samples.

Available records indicate only two loads of topsoil from the PCB-impacted material staged at the RH Law property were hauled and deposited on the west side of the new curb along the edge of the parking lot.

The preferred method for handling excavated soil is to live load the material for direct transport to the landfill facility. In the event that material needs to be temporarily stockpiled, piles will be maintained for the soil with less than 50 ppm. To the extent possible, the locations selected for the soil stockpiles will have sufficient area to contain the anticipated volume of soil to be removed, consist of relatively flat land that would not be susceptible to flooding or inundation of water during precipitation events, be readily accessible to equipment that will be utilized for loading and hauling the material, and be located away from stormwater or site drainage components, wells, and any wetlands, streams, rivers, or other water bodies. Contaminated soil stockpiles will be placed on and covered with 6-mil polyethylene sheeting or other comparable impervious material that can be readily removed and disposed of. Polyethylene sheeting, or other impervious membrane used for the base of the soil stockpile, will be placed with sheets overlapping a minimum of 1 foot. The base of the soil stockpile will be bermed at the perimeter to contain the soil stockpile and potential runoff during precipitation events. The berm materials, which can be comprised of mounds of clean soil material, hay bales, lumber, or other readily available suitable materials, will be placed along the perimeter and wrapped with the polyethylene sheeting or other impervious membrane that is used for the base of the soil stockpile. To minimize extraneous handling of materials and the size of the completed soil stockpile areas, the berm perimeter will initially be constructed along 2 sides, and the remaining 2 sides will be constructed after all soil material is placed in the stockpile or temporarily bermed at the end of each workday.

To the extent possible, the height and slopes of soil stockpiles will be limited such that slope stability is not compromised during storage or the loading process. Soil stockpiles will be covered with the polyethylene sheeting upon placement of all impacted soil material or at the end of each workday. Seams will be overlapped a minimum of 1 foot. The stockpile cover will be sufficiently weighted to contain the stored soil and resist damage from wind. Materials used to weigh down and stabilize the stockpile cover will consist of readily available materials that would not tend to damage the cover upon placement (e.g., clean soil material, sand bags, tires).

Temporary on-site soil stockpiles will be periodically inspected to ensure that the material continues to be contained and is not released to the surrounding environment. Temporary on-site soil stockpiles will need to be properly protected and maintained until removal and off-site disposal. Soil stockpiles shall not remain on-site in excess of 60 days. Polyethylene sheeting will be repaired or replaced as needed. Water from precipitation events that ponds on the surface of the stockpile cover will be removed upon discovery. The ponded water can be discharged on-site provided there is no contact with the PCB-

contaminated soil. Water that contacts the PCB-impacted soil will be properly containerized and managed as impacted wastewater.

3.6 PCB-Contaminated Soil Disposal

The PCB-contaminated soil material will be loaded and hauled to an approved off-site landfill facility for disposal. The waste material is considered to be non-hazardous (i.e., less than 50 ppm PCB), and will be transferred to a local landfill that is permitted to accept this type of waste. For this project, RH Law has selected Seneca Meadows, Inc., located at 1786 Salcman Road, Waterloo, Seneca County, New York, as the destination facility for the non-hazardous waste. Seneca Meadows, Inc., maintains a 6 NYCRR Part 360 permit under NYSDEC Permit No. 8453200023/00001.

Waste liquid generated during the excavation activities will be transferred to an appropriate disposal facility, with waste profiles and laboratory analysis completed as required by the selected receiving facility. It is anticipated that waste liquid sources would be limited to waste liquids generated during decontamination activities, but may also include impacted water from precipitation that comes into contact with the PCB-impacted soil.

Trucks used to haul waste materials off-site must be permitted to haul the type of waste generated, in accordance with 6 NYCRR Part 364 regulatory requirements. Copies of waste manifests and/or disposal receipts shall be retained for all wastes generated in association with the site remediation activities. Copies of these documents will be included with the Remediation Action Report (RAR) that is completed for the site remediation.

3.7 Post-Excavation Soil Sampling and Analysis

3.7.1 Sample Locations and Methodology

Prior to, or during, the excavation activities, cleanup confirmation soil samples will be collected from each excavated zone. The soil sample from each zone will consist of two or three grab samples that will be composited into a single sample for laboratory analysis. The Post-Excavation Soil Sampling Plan, contained in Appendix E, shows the general layout of the cleanup confirmation soil sample locations. In addition, three or four grab samples will be collected and composited from the area below the SE Pile location.

Dedicated disposable sampling equipment and/or items that can be readily decontaminated between sample locations will be used to collect the post-excavation confirmation soil samples throughout the area that the sample will be representative of. Soil samples will be collected in clean laboratory glassware, with Teflon-lined lids, in accordance with industry standard protocol. Samples will be stored in a cooler, with ice, and maintained at approximately 4°C during storage and delivery to the laboratory.

3.7.2 Laboratory Analysis

The confirmation soil samples will be submitted to Pace Analytical Services, Inc., located in Schenectady, New York, a NYSDOH ELAP approved laboratory (ELAP No. 11078). The samples were laboratory analyzed for PCB, in accordance with EPA Method 8082 using Accelerated Solvent Extraction (ASE) (EPA Method 3545).

3.7.3 Quality Assurance/Quality Control

For quality assurance/quality control, ATL Engineering representatives will collect field duplicates, rinsate blanks, and matrix spike/matrix spike duplicate (MS/MSD) samples. Field duplicate samples and MS/MSD samples will be collected at a frequency of 1 per 20 samples collected, or at least one per day. Rinsate blank samples will be collected at a frequency of one per day.

3.8 Waste Characterization Sampling and Analysis

For material exhibiting less than 50 ppm PCB, the PCB analysis data collected during the site investigation and characterization phase has been determined to be sufficient to characterize and profile the waste prior to acceptance by the selected landfill facility (Seneca Meadows, Inc.).

3.9 Topsoil Replacement and Landscaping

Subsequent to completion of excavation activities and receipt of satisfactory cleanup confirmation soil sampling and analysis results for the designated zones, RH Law will replace the removed topsoil with a clean topsoil material and landscape the area pursuant to agreements between RH Law and the property owner.

3.10 Remedial Action Report

Subsequent to completion of the proposed remedy for the PCB impacted top soil at the subject site, ATL Engineering will prepare a Remedial Action Report (RAR) for submittal, review, and approval by the NYSDEC. The RAR will include the following:

- A summary of our findings, and a description of the methodologies employed and significant field observations made during the remedial activities
- Copies of the laboratory reports and associated sample custody documentation, and a discussion of the laboratory results
- Copies of waste manifests and/or disposal receipts
- A Remediation Plan (not-to-scale), illustrating the extent of the excavation activities, soil sample locations, and other pertinent site features. The Remediation Plan drawing will be based on drawings previously prepared for the subject sites
- Recommendations regarding site spill closure or modified and/or additional remedial activities, as warranted

4.0 SCHEDULE CONSIDERATIONS

RH Law intends to complete all remediation and site restoration work for the subject site during the summer months while the school facility is not in session and school site operations are minimal. This approach is beneficial to the site owner and the general public, as there would be better control and security of the established work area and reduced potential for public exposure.

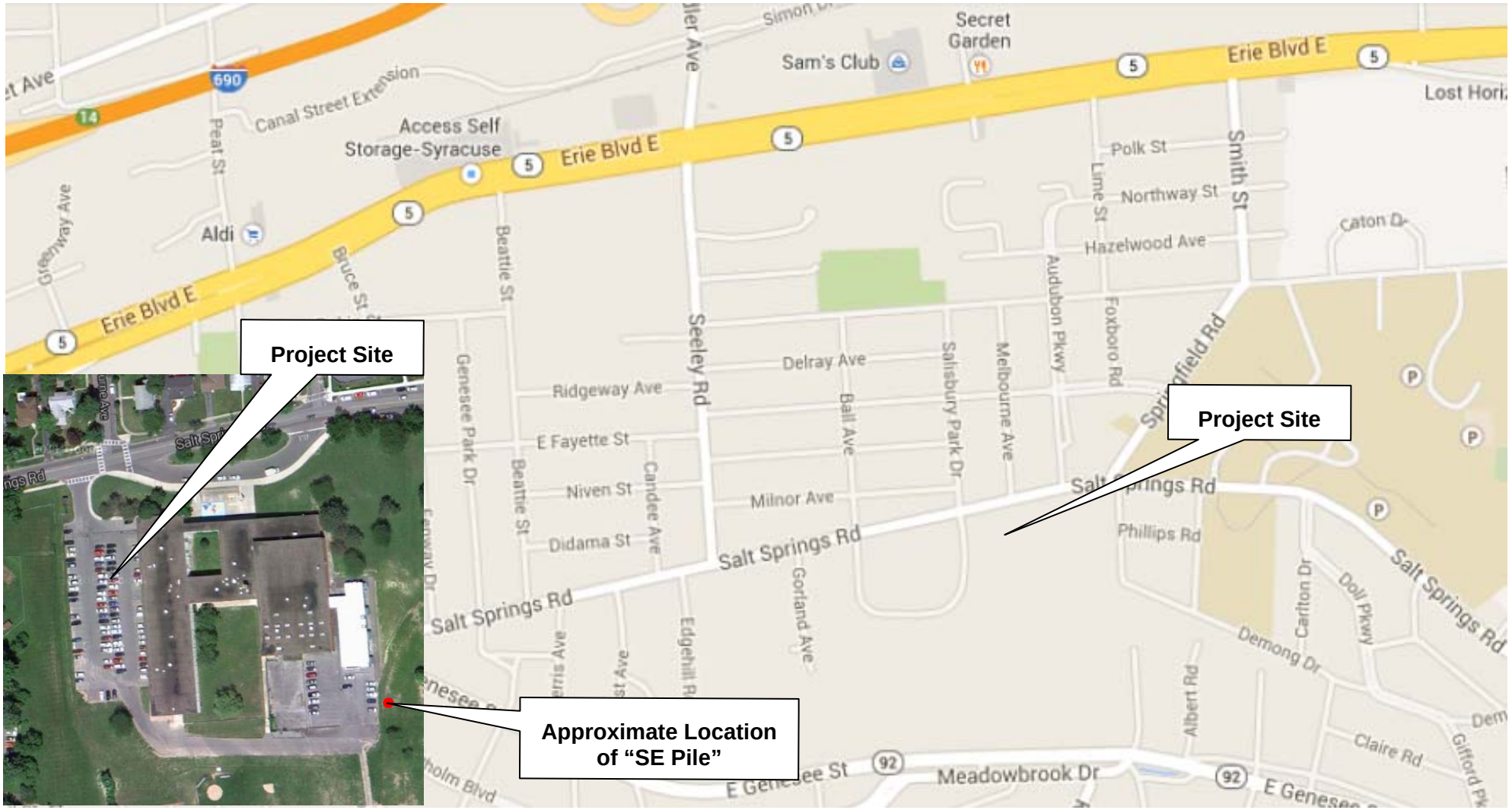
5.0 PROJECT CONTACT INFORMATION

The following contact information is provided for reference, and lists key personnel and telephone numbers to facilitate effective communication in the event that suspect petroleum-contaminated soil is encountered during excavation activities.

Entity	Role	Primary Contact	Phone Numbers
H.W. Smith School	Director of Facilities (Syracuse City School District)	Mr. Thomas Ferrara	Office: 315-435-4292
RH Law, Inc.	Site Remediation and Management	Mr. Richard Law	Office: 315-437-5906 Cellular: 315-437-3650
ATL Engineering	Environmental Consultant	Mr. Cheyenne Dashnaw, PE	Office: 315-386-4578 Cellular: 315-261-8144
Soaring Eagle Safety Consultants, Inc.	Health and Safety Consultant	Mr. Paul W. Tranchell, CIH, CSP, RBP	Office: 315-506-6690
NYSDEC Region 7 Office	Regulatory Review and Compliance	Mr. Harry Warner, PE	Office: 315-426-7400

Appendix A

Site Location Map

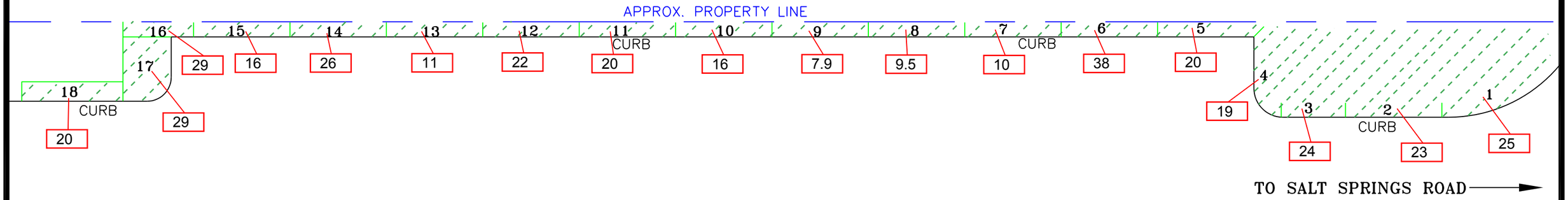


Site Location Map	Drawn by: ASV	Scale: Not to scale	Project No.: ST5583	Date: July 2013
H.W. Smith School **1130 Salt Springs Road** **Syracuse, New York**	***ATLANTIC TESTING LABORATORIES*, Limited** Albany, NY · Binghamton, NY · Canton, NY · Elmira, NY · Plattsburgh, NY Poughkeepsie, NY · Syracuse, NY · Rochester, NY · Utica, NY · Watertown, NY			

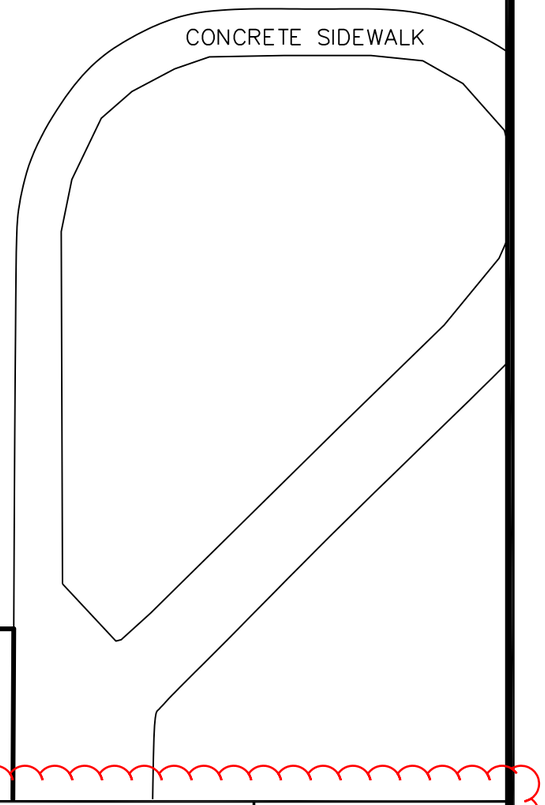
Appendix B

PCB Delineation Plan

COMPOSITE SAMPLES COLLECTED FROM EACH GRID SECTION FROM THE TOP SOIL LAYER APPROXIMATELY SURFACE TO EIGHTEEN INCHES BELOW GRADE. A TOTAL OF SIX GRAB SAMPLES WERE COLLECTED TO FORM EACH COMPOSITE SAMPLE. SAMPLES COLLECTED BY CES PERSONNEL ON MAY 9, 2013.



**Sample identified as "SE Pile" determined to contain 14 ppm PCB and will also require excavation.



Legend

Zones determined to contain soil with less than 50 ppm PCB.

Laboratory analysis results for composite soil samples collected by CES on May 9, 2013 indicated with ##. Concentration provided in ppm.

HW SMITH ELEMENTARY SCHOOL
SYRACUSE CSD

1130 SALT SPRINGS ROAD
SYRACUSE, NEW YORK 13224

PCB DELINEATION PLAN

PCB Sampling Map drawing prepared by CES and dated May 2013 was modified by ATL Engineering, as necessary to generate this PCB Delineation Plan.

FIGURE 1	APPROX. SCALE: 1"=20'	DATE: May 2013
PCB SAMPLING MAP	RH Law, Inc. (Spill #1207324) HW Smith Elementary School Syracuse, New York	
CES Certified Environmental Services,Inc.		

Appendix C

Soil Investigation Report

ATL ENGINEERING, P.C.

July 22, 2013

New York State Department of Environmental Conservation
Region 7, Division of Environmental Remediation
615 Erie Boulevard West
Syracuse, New York 13204

Attn: Mr. Harry Warner, PE

Re: Soil Investigation Report
NYSDEC Spill No. 13-03517
H.W. Smith School
1130 Salt Springs Road
Syracuse, Onondaga County, New York
ATL Engineering Report No. AE094CE-05-07-13

Ladies/Gentlemen:

The information presented herein is provided as a summary of findings for soil investigations that were performed for the subject site. The soil investigations were initially conducted by Certified Environmental Services, Inc. (CES) to evaluate the extent of polychlorinated biphenyls (PCB) in topsoil material that was placed at the subject site by RH Law, Inc. (RH Law) on October 18, 2012.

Site Description

H.W. Smith School is located at 1130 Salt Springs Road, Syracuse, Onondaga County, New York. The affected areas of the subject site, where topsoil was placed by RH Law during scheduled site improvements, is located on the west side of the H.W. Smith Elementary School and parking lot, specifically along the back edge of new curb installed along the edge of the parking lot. A Site Location Map, depicting the approximate location of the subject site and affected areas, is included as Attachment A.

The H.W. Smith Elementary School is currently undergoing a renovation project. The area on the west side of the school building includes a parking lot and originally grass area. Due to the current construction, the parking area is fenced off and inaccessible to the general public. Information provided by RH Law indicates the topsoil material was generally placed at depths of 4 to 6 inches. Furthermore, RH Law identified, and CES reported, that a small stockpile of the soil was located toward the southeast corner of the property. The Site Location Map in Attachment A shows the general location of the referenced stockpile identified as "SE Pile."

Background Information

New York State Department of Environmental Conservation (NYSDEC) Spill No. 12-07324 was assigned to the RH Law property, located at 6883 Schuyler Road, East Syracuse, New York, subsequent to the identification of elevated PCB concentrations in topsoil material staged at that site. Soil sampling investigations performed by CES indicate the likely source of the PCB contamination is a site identified as Woodbine Office Park, located at the southeast intersection of Canada Drive and Loucks Road, East Syracuse, Onondaga County, New York. Prior to having knowledge of PCB within the referenced topsoil material, this material was placed by RH Law at five project sites, including the H.W. Smith School. Based on the separate locations and different owners of the affected sites, and as a means to manage each site individually with respect to investigation and remediation activities, the NYSDEC was contacted to assign a distinct spill number to each of the affected sites. The H.W. Smith School site was assigned NYSDEC Spill No. 13-03517.

Soil Sampling and Analysis

Soil sampling and analysis, conducted by CES in May 2013, identified PCB within the topsoil material. The sampling was conducted by CES in accordance with a sampling plan submitted to the NYSDEC by CES and dated April 19, 2013. For the areas along the edge of new curb on the west side of the school building, composite soil samples were collected from segmented zones. The areas that were narrow and long in shape were segmented into approximate 20-foot linear sections. The larger areas were segmented into approximate 20- by 20-foot zones. A composite soil samples was also collected from the "SE Pile" stockpile and the quantity contained in this stockpile was estimated at 6 cubic yards. Attachment B includes a Sample Location Plan, originally prepared by CES to include the sampled zones and associated zone identifications.

Composite soil samples collected by CES on May 9, 2013, were laboratory analyzed by CES, a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) approved laboratory (ELAP No. 11246). One of the collected samples was split and submitted to Life Science Laboratories, Inc. (LSL) for analysis. LSL is a NYSDOH ELAP approved laboratory under ELAP No. 10248. CES performed PCB analysis in accordance with EPA Method 8082, using Soxhlet extraction (EPA Method 3540C). LSL performed PCB analysis in accordance with EPA Method 8082, using ultrasonic extraction (EPA Method 3550B). A summary of the laboratory analysis results for soil samples collected by CES is included in Table I under the "Summary of Findings" section.

Summary of Findings

A summary of the laboratory analysis results for the composite soil samples collected by CES on May 9, 2013, is provided in Table I below. Sample zone identifications are referenced from the Sample Location Plan contained in Attachment B. This drawing was originally prepared by CES to show the designated zone identifications, and was subsequently modified by ATL to include approximate extents of impacted soil.

Table I
Summary of Laboratory Analysis Results

Sample Identification (Collected by)	Date Collected	Sample Type	Sample Zone	Analyzed by	Extraction Method	Total PCB Detected (ppm)
1 (CES)	05/09/13	Composite	1	CES	EPA 3540C	25
2 (CES)	05/09/13	Composite	2	CES	EPA 3540C	23
3 (CES)	05/09/13	Composite	3	CES	EPA 3540C	24
4 (CES)	05/09/13	Composite	4	CES	EPA 3540C	19
5 (CES)	05/09/13	Composite	5	CES	EPA 3540C	20
6 (CES)	05/09/13	Composite	6	CES	EPA 3540C	38
7 (CES)	05/09/13	Composite	7	CES	EPA 3540C	10
8 (CES)	05/09/13	Composite	8	CES	EPA 3540C	9.5
9 (CES)	05/09/13	Composite	9	CES	EPA 3540C	7.9
10 (CES)	05/09/13	Composite	10	CES	EPA 3540C	16
11 (CES)	05/09/13	Composite	11	CES	EPA 3540C	20
12 (CES)	05/09/13	Composite	12	CES	EPA 3540C	22
13 (CES)	05/09/13	Composite	13	CES	EPA 3540C	11
13* (CES)	05/09/13	Composite	13	LSL	EPA 3550B	7.3*
14 (CES)	05/09/13	Composite	14	CES	EPA 3540C	26
15 (CES)	05/09/13	Composite	15	CES	EPA 3540C	16
Field Duplicate	05/09/13	Composite	15	CES	EPA 3540C	32
16 (CES)	05/09/13	Composite	16	CES	EPA 3540C	29
17 (CES)	05/09/13	Composite	17	CES	EPA 3540C	29
18 (CES)	05/09/13	Composite	18	CES	EPA 3540C	20
SE Pile (CES)	05/09/13	Composite	Stockpile	CES	EPA 3540C	14

Notes: Sample zone identifications are referenced from the Sample Location Plan, included as Attachment B.

All laboratory results are expressed in parts per million (ppm), or mg/kg.

ND = Not detected above the laboratory method detection limits.

The detected PCB for all collected samples are Aroclor 1248.

* Sample 13 was split and analyzed by Life Sciences Laboratory (ELAP No. 10248)

Conclusions and Recommendations

As indicated in Table I under the Summary of Findings section, laboratory analysis results for composite soil samples, collected by CES on May 9, 2013, identified detectable concentrations of PCB, specifically Aroclor 1248. The detected PCB concentrations for soil samples collected by CES were below the hazardous material limit of 50 ppm, and not within a range considered to be close to the hazardous material limit (i.e., material within the range of 40 to 49 ppm).

Upon review of the results for the composite samples collected from sampling zone numbers 1 through 18, it is noted that the PCB concentrations associated with the topsoil material placed at the H.W. Smith School did not exceed the hazardous material designation limits. Pursuant to the information provided in the PCB-Contaminated Soil Management Summary letter (ATL Engineering Report No. AE094CE-01-07-13, dated July 2, 2013), submitted by ATL Engineering to the NYSDEC for review and approval, and past correspondence with NYSDEC representatives, the PCB-impacted topsoil associated with the subject site is under conditions considered suitable for remediation specifically as material that contains less than 50 ppm. It is

therefore proposed that affected topsoil on the H.W. Smith School site be managed as soil impacted with less than 50 ppm PCB.

The information presented herein is provided as a summary of site investigations and soil sampling and analysis data collected for the PCB-impacted topsoil material placed at the H.W. Smith School, located at 1130 Salt Springs Road, Syracuse, Onondaga County, New York. The conclusions and recommendations are provided for consideration and approval by the NYSDEC prior to preparation of a comprehensive Remedial Action Work Plan.

Please review the information presented and provide a response confirming agreement, or comment to the contrary. Please contact our office should you have any questions, or if you need additional information.

Sincerely,
ATL Engineering, P.C.

Cheyenne J. Dashnaw, PE
Senior Project Manager

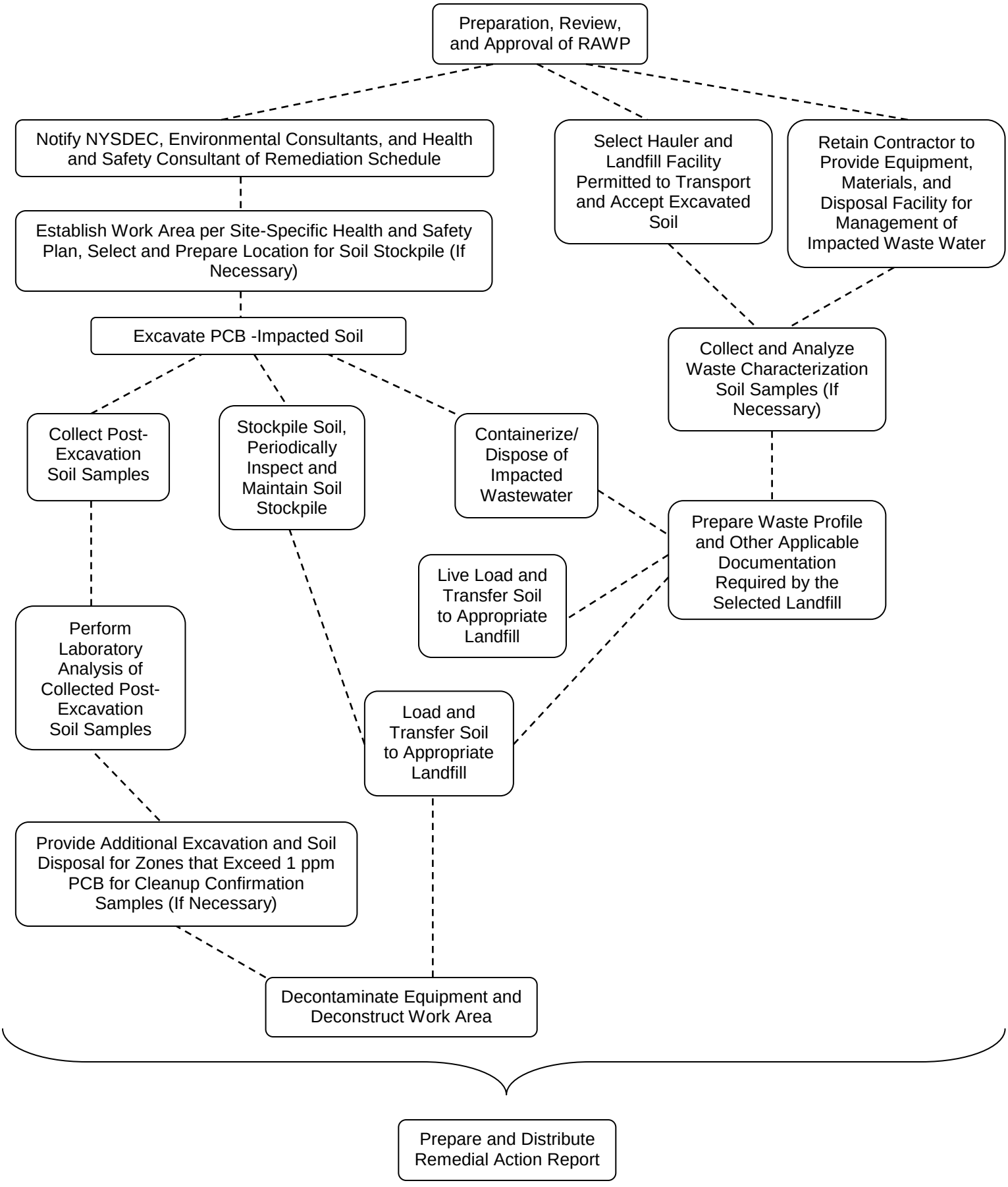
CJD/MBR/asv

Attachments

cc: Richard Law, RH Law, Inc.

Appendix D

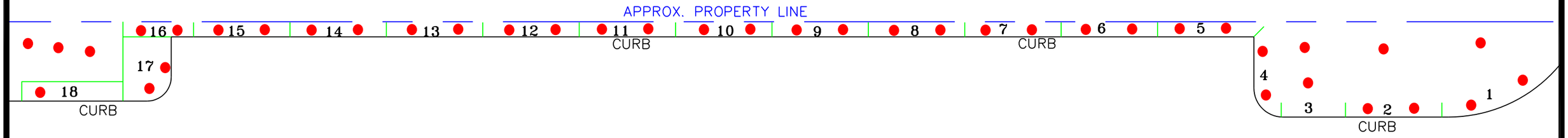
Project Remediation Flow Chart


Preparation, Review, and Approval of RAWP
Notify NYSDEC, Environmental Consultants, and Health and Safety Consultant of Remediation Schedule
Select Hauler and Landfill Facility Permitted to Transport and Accept Excavated Soil
Retain Contractor to Provide Equipment, Materials, and Disposal Facility for Management of Impacted Waste Water
Establish Work Area per Site-Specific Health and Safety Plan, Select and Prepare Location for Soil Stockpile (If Necessary)
Excavate PCB -Impacted Soil
Collect and Analyze Waste Characterization Soil Samples (If Necessary)
Collect Post-Excavation Soil Samples
Stockpile Soil, Periodically Inspect and Maintain Soil Stockpile
Containerize/ Dispose of Impacted Wastewater
Prepare Waste Profile and Other Applicable Documentation Required by the Selected Landfill
Live Load and Transfer Soil to Appropriate Landfill
Perform Laboratory Analysis of Collected Post-Excavation Soil Samples
Load and Transfer Soil to Appropriate Landfill
Provide Additional Excavation and Soil Disposal for Zones that Exceed 1 ppm PCB for Cleanup Confirmation Samples (If Necessary)
Decontaminate Equipment and Deconstruct Work Area
Prepare and Distribute Remedial Action Report

Appendix E

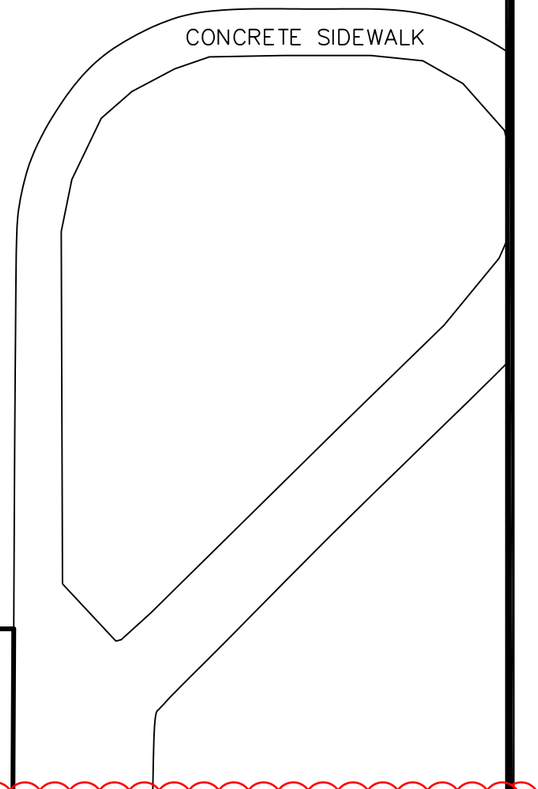
Post-Excavation Soil Sampling Plan

COMPOSITE SAMPLES COLLECTED FROM EACH GRID SECTION FROM THE TOP SOIL LAYER APPROXIMATELY SURFACE TO EIGHTEEN INCHES BELOW GRADE. A TOTAL OF SIX GRAB SAMPLES WERE COLLECTED TO FORM EACH COMPOSITE SAMPLE. SAMPLES COLLECTED BY CES PERSONNEL ON MAY 9, 2013.



TO SALT SPRINGS ROAD →

**Soil remaining beneath area previously identified and sampled as "SE Pile" will also require post-excavation sampling and analysis.



Legend

- Grab sample locations for each zone to be composited into cleanup confirmation soil sample.

HW SMITH ELEMENTARY SCHOOL
SYRACUSE CSD

1130 SALT SPRINGS ROAD
SYRACUSE, NEW YORK 13224

POST-EXCAVATION SAMPLING PLAN

PCB Sampling Map drawing prepared by CES and dated May 2013 was modified by ATL Engineering, as necessary to generate this Post-Excavation Soil Sampling Plan.

FIGURE 1	APPROX. SCALE: 1"=20'	DATE: May 2013
PCB SAMPLING MAP	RH Law, Inc. (Spill #1207324) HW Smith Elementary School Syracuse, New York	
CES Certified Environmental Services,Inc.		